

BARTLIT BECK HERMAN PALENCHAR & SCOTT LLP  
 Lester C. Houtz ([lester.houtz@bartlit-beck.com](mailto:lester.houtz@bartlit-beck.com))  
 Karma M. Giulianelli ([karma.giulianelli@bartlit-beck.com](mailto:karma.giulianelli@bartlit-beck.com))  
 André M. Pauka ([andre.pauka@bartlit-beck.com](mailto:andre.pauka@bartlit-beck.com))  
 Daniel R. Brody ([daniel.brody@bartlit-beck.com](mailto:daniel.brody@bartlit-beck.com))  
 1899 Wynkoop Street, 8th Floor  
 Denver, CO 80202  
 Telephone: (303) 592-3100  
 Facsimile: (303) 592-3140

BARTLIT BECK HERMAN PALENCHAR & SCOTT LLP  
 Mark E. Ferguson ([mark.ferguson@bartlit-beck.com](mailto:mark.ferguson@bartlit-beck.com))  
 54 West Hubbard Street, Suite 300  
 Chicago, IL 60654  
 Telephone: (312) 494-4400  
 Facsimile: (312) 494-4440

Attorneys for Plaintiff Hewlett-Packard Company

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION**

IN RE OPTICAL DISK DRIVE PRODUCTS  
 ANTITRUST LITIGATION

MDL Docket No. 3:10-md-02143-RS-JCS

This Document relates to:

Case No. 3:13-cv-5371-RS

Hewlett-Packard Company,  
 Plaintiff,

**STIPULATION AND ~~PROPOSED~~  
 ORDER REGARDING SERVICE OF  
 PROCESS**

v.  
 LG Electronics, Inc.; LG Electronics USA,  
 Inc.; Hitachi-LG Data Storage, Inc.;  
 Hitachi-LG Data Storage Korea, Inc.;  
 Koninklijke Philips N.V.; Lite-On IT  
 Corporation of Taiwan; BenQ Corporation;  
 Philips BenQ Digital Storage; BenQ America  
 Corporation; Philips & Lite-On Digital  
 Solutions Corporation; Philips & Lite-On  
 Digital Solutions USA, Inc.; Pioneer  
 Corporation; Pioneer North America, Inc.;  
 Pioneer Electronics (USA) Inc.; Pioneer High  
 Fidelity Taiwan Co., Ltd.; Sharp Corporation;  
 and Pioneer Digital Design & Manufacturing  
 Company,

Judge Richard Seeborg

Defendants.

# STIPULATION

It is stipulated by and between the undersigned parties, by their respective attorneys, that:

1. Undersigned Counsel of EIMER STAHL LLP agree to accept service of the complaint in *Hewlett-Packard Company v. LG Electronics, Inc., et al.*, Case No. 3:13-cv-05371-RS, on behalf of Defendants LG Electronics, Inc. (“LG Electronics”) and LG Electronics USA, Inc. (“LG Electronics USA”). LG Electronics and LG Electronics USA shall have until Thursday, April 17, 2014 to file a response thereto.

2. Undersigned Counsel of ROPES & GRAY LLP agree to accept service of the complaint in *Hewlett-Packard Company v. LG Electronics, Inc., et al.*, Case No. 3:13-cv-05371-RS, on behalf of Defendants Hitachi-LG Data Storage, Inc. (“HLDS”) and Hitachi-LG Data Storage Korea, Inc. (“HLDS Korea”). HLDS and HLDS Korea shall have until Thursday, April 17, 2014 to file a response thereto.

3. Undersigned Counsel of BAKER BOTTS LLP agree to accept service of the complaint in *Hewlett-Packard Company v. LG Electronics, Inc., et al.*, Case No. 3:13-cv-05371-RS, on behalf of Defendants Koninklijke Philips N.V., Philips & Lite-On Digital Solutions Corporation, Philips & Lite-On Digital Solutions USA, Inc., and Lite-On IT Corporation of Taiwan (collectively, the “PLDS Defendants”). The PLDS Defendants shall have until Thursday, April 17, 2014 to file a response thereto.

4. Undersigned Counsel of DICKSTEIN SHAPIRO LLP agree to accept service of the complaint in *Hewlett-Packard Company v. LG Electronics, Inc., et al.*, Case No. 3:13-cv-05371-RS, on behalf of Defendants BenQ Corporation and BenQ America Corp. (collectively, the “BenQ Defendants”). The BenQ Defendants shall have until Thursday, April 17, 2014 to file a response thereto.

5. Undersigned Counsel of JONES DAY agree to accept service of the complaint in *Hewlett-Packard Company v. LG Electronics, Inc., et al.*, Case No. 3:13-cv-05371-RS, on behalf of Defendants Pioneer Corporation, Pioneer North America, Inc., Pioneer Electronics (USA) Inc., Pioneer High Fidelity Taiwan Co., Ltd., and Pioneer Digital Design & Manufacturing Company (collectively, the “Pioneer Defendants”). The Pioneer Defendants shall have until Thursday,

1 April 17, 2014 to file a response thereto.

2 6. This Stipulation does not constitute a waiver by Defendants of any defense,  
3 including but not limited to those defenses provided under Rule 12 of the Federal Rules of Civil  
4 Procedure.

5 7. To the extent any Defendant or Defendants move to dismiss the Complaint under  
6 Rule 12(b)(6) of the Federal Rules of Civil Procedure or otherwise, the parties shall work in good  
7 faith to reach an agreed-upon briefing schedule that they shall present to the Court no later than  
8 Thursday, May 1, 2014, but in no event shall Hewlett-Packard's response to any such motion(s)  
9 be due before Monday, June 16, 2014.

1 IT IS SO STIPULATED.

2 Dated: January 17, 2014

**BARTLIT BECK HERMAN PALENCHAR  
& SCOTT LLP**

/s/ Lester C. Houtz

Lester C. Houtz  
Attorneys for Plaintiff  
HEWLETT-PACKARD COMPANY

6 Dated: January 17, 2014

**EIMER STAHL LLP**

/s/ Nathan P. Eimer

Nathan P. Eimer  
Attorneys for Defendants  
LG Electronics, Inc. and LG Electronics USA,  
Inc.

11 Dated: January 17, 2014

**ROPES & GRAY LLP**

/s/ Mark S. Popofsky

Mark S. Popofsky  
Attorneys for Defendants  
Hitachi-LG Data Storage, Inc. and Hitachi-LG  
Data Storage Korea, Inc.

16 Dated: January 17, 2014

**BAKER BOTTS LLP**

/s/ John M. Taladay

John M. Taladay  
Attorneys for Defendants  
Koninklijke Philips N.V.; Philips & Lite-On  
Digital Solutions Corporation; Philips & Lite-  
On Digital Solutions USA, Inc.; Lite-On It  
Corporation of Taiwan

21 Dated: January 17, 2014

**DICKSTEIN SHAPIRO LLP**

/s/ Joel B. Kleinman

Joel B. Kleinman  
Attorneys for Defendants  
BenQ Corporation and BenQ America  
Corporation

1 Dated: January 17, 2014

**JONES DAY**

/s/ Eric P. Enson

Eric P. Enson

Attorneys for Defendants

Pioneer North America, Inc.; Pioneer

Electronics (USA) Inc.; Pioneer Corporation

and Pioneer High Fidelity Taiwan Co., Ltd.

6 **ATTESTATION**

7 Pursuant to Rule 5-1(i)(3) of the Local Rules of Practice in Civil Proceedings Before the  
8 United States District Court for the Northern District of California, I hereby attest that  
9 concurrence in the filing of this document has been obtained from each of the other signatories.

10 Dated: January 17, 2014

/s/ Lester C. Houtz

Lester C. Houtz

13 **PURSUANT TO STIPULATION, IT IS SO ORDERED**

14  
15 Dated: 1 / 24 /, 2014



Honorable Richard S. Suborg  
United States District Judge